

Remarks

Claims 13, 20-22, 24-27, 32, and 40 have been amended. Claims 41-56 have been added. Claims 1-56 are pending in the Application. No new matter has been added. Entry of these amendments is respectfully requested. Reconsideration is respectfully requested.

Claims 13, and 24-26 have been amended to correct typographical errors and remove the phrases "the step of". Dependent claims 20, 21, 22, 27, 32, and 40 have been amended to further clarify the subject matter of the claims.

The basis for the new claims 41-56 may be found in the Specification and original claims.

35 U.S.C. § 112, Second Paragraph, Rejection

In the Action, claims 21, 22, 27, 32, and 40 were rejected pursuant to 35 U.S.C. § 112, second paragraph. This rejection is respectfully traversed. It is respectfully submitted that each of these claims particularly points out and distinctly claims the subject matter which Applicant regards as the invention. However to further clarify the subject matter of these claims, claims 21, 22, 27, 32, 40 and have been amended herein.

Amended claim 21 recites that the first transaction machine interface software includes at least one output indicative function. When the first input is entered, the output indicative function is operative to indicate a value associated with at least one element included in an initial output through the first output device. The event processor software is operative to call the output indicative function and is operative to cause the first transaction function device to operate responsive to the event and the value indicated by the output indicative function. Support for this

claim is found for example in the Specification (page 17, line 22 to page 18, line 8). Claim 22 depends from claim 21 and has been amended to correspond to amended claim 21.

Amended claims 27, 32, and 40 recite computer readable media. The media bears instructions which are operative to cause at least one computer in the machine to cause the machine to carry out the method steps recited in claim 23, 31, and 33 respectively. The Action asserts that Applicant should not present an article claim which depends from a method claim. However, Applicant is not aware of any statute or rule which indicates that this form of claim is not proper. In addition, similar claims are found in numerous granted patents such as claim 17 of U.S. Patent No. 6,039,245. As such claim construction is sufficiently definite and particularly points out and distinctly claims the subject matter which Applicant regards as the invention, it is respectfully submitted that the 35 U.S.C. § 112, second paragraph, rejections have been overcome.

The Pending Claims Are Not Anticipated or Obvious in View of the Applied Art

Claims 31-34 were rejected under 35 U.S.C. § 102(b) as being anticipated by Bosak. Claims 12-22 and 28-30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bosak.

Claims 1-11, 23-27, and 33-40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rivett-Carnac in view of Bosak.

These rejections are respectfully traversed.

Bosak Reference Is Not Prior Art

The Bosak reference cited in the Action appears to be an electronic or Internet publication retrieved from <http://ibiblio.org/pub/sun-info/standards/xml/why/xmlapps.htm>. Prior art disclosure on the Internet or on an on-line database can only be considered to be publicly available as of the date the item was publicly posted. As indicated in MPEP § 2128, "If the publication does not include a publication date (or retrieval date), it cannot be relied upon as prior art under 35 U.S.C. 102(a) or (b)."

The Bosak reference includes a "Last revised" date of "1997.03.10." The Bosak reference does not indicate that this date is a publication date or a retrieval date. As a result the Office has failed to show that the Bosak reference was "publicly available" as of this date. The "last revised" date is not capable of corroboration and cannot be used to establish prior art status. At best it is an assertion that the document was revised by the author on this date. Nothing of record indicates or in any manner establishes that the Bosak document was posted on the Internet and publicly available as of the purported revision date.

The other date associated with the document is found in the footer. The footer date appears to indicate that the web page was retrieved and printed on "5/17/2001." This retrieval date is well after Applicant's priority date of October 19, 1998 and filing date of January 19, 1999. As a result, the Bosak reference is not prior art and the rejections based on the Bosak reference are not proper. As all of the rejections in the Action were based fully or in part on the Bosak reference, it is respectfully requested that the rejections of claims 1-40 be withdrawn on this basis.

**The Applied References Do Not Disclose or Suggest
the Features and Relationships Recited in Applicant's Claims**

Anticipation pursuant to 35 U.S.C. § 102(b) requires that a single prior art reference contain all the elements of the claimed invention arranged in the manner recited in the claim. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548, 220 USPQ 193, 198 (Fed. Cir. 1983).

Anticipation under 35 U.S.C. § 102(b) requires in a single prior art disclosure, each and every element of the claimed invention be arranged in a manner such that the reference would literally infringe the claims at issue if made later in time. *Lewmar Marine, Inc. v. Barient, Inc.*, 822 F.2d 744, 747, 3 USPQ2d 1766, 1768 (Fed. Cir. 1987).

Before a claim may be rejected on the basis of obviousness pursuant to 35 U.S.C. § 103, the Patent Office bears the burden of establishing that all the recited features of the claim are known in the prior art. This is known as *prima facie obviousness*. To establish *prima facie* obviousness, it must be shown that all the elements and relationships recited in the claim are known in the prior art. MPEP § 2142.

Absent a showing of a teaching, suggestion or motivation to produce a claimed combination, an obviousness rejection is not proper even if all the recited features are known in the prior art. *Panduit Corp. v. Denison Mfg. Co.*, 810 F.2d 1561, 1568, 1 USPQ2d 1593 (Fed. Cir. 1987). *In re Newell*, 891 F.2d 899, 901, 902, 13 USPQ2d 1248, 1250 (Fed. Cir. 1989).

The teaching, suggestion or motivation to combine the features in prior art references must be clearly and particularly identified in such prior art to support a rejection on the basis of obviousness. It is not sufficient to offer a broad range of sources and make conclusory statements. *In re Dembiczak*, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

It is respectfully submitted that the Action does not meet these burdens.

**The Features Recited in Applicant's Claims
Patentably Distinguish Over Bosak**

In the Action claims 31-34 were rejected under 35 U.S.C. § 102(b) as being anticipated by Bosak. These rejections are respectfully traversed. Applicant's response to these rejections is based on the Office's referenced interpretations of Bosak. Thus, any change in the Office's interpretation of this reference shall constitute a new ground of rejection.

As indicated previously, Applicant traverses these rejections on the grounds that Bosak is not prior art. In addition Applicant traverses these rejections on the grounds that the Bosak reference does not contain all the elements of the claimed invention arranged in the manner recited in the claims. The features recited in Applicant's claims patentably distinguish over the Bosak reference.

Claim 31

Claim 31 is an independent claim directed to a method of operating an automated transaction machine. The claim recites: a) operating a computer in the machine to receive at least one document; b) operating the computer to receive data in at least one style sheet; and c) providing an output through at least one visual output device on the machine responsive to operation of the computer. Claim 31 further recites that the at least one component of the output is produced responsive to the document and at least one visual attribute of the component is produced responsive to the style sheet.

The Action alleges that Bosak teaches the basics of XML and style sheets. However, the Action does not show where Bosak discloses the elements and steps specifically recited in claim 31. For example claim 1 recites operating a computer in an ATM. Bosak does not disclose or suggest an ATM. Claim 31 recites operating the computer in the ATM to receive a document. Bosak does not disclose or suggest a computer in an ATM that receives a document. Claim 31 also recites operating the computer in the ATM to receive a style sheet. Bosak does not disclose or suggest a computer in an ATM that receives a style sheet. Claim 31 further recites providing an output through a visual output device on the ATM where at least one component of the output is produced responsive to the document and at least one visual attribute of the component is produced responsive to the style sheet. Bosak does not disclose or suggest providing an output on an ATM with components and visual attributes that are produced response to a document and a style sheet.

Bosak does not disclose each and every element of the claimed invention arranged in the manner recited in the claim, as is required to sustain the rejection. Hence, Applicant's claim 31 patentably distinguishes over the Bosak reference. Therefore, it is respectfully submitted that the 35 U.S.C. § 102(b) rejection has been overcome. It follows that claim 32 and new claims 43 and 44 which depend from claim 31 are likewise allowable.

The Pending Claims Are Not Obvious Over Bosak

In the Action claims 12-22 and 28-30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bosak. These rejections are respectfully traversed. Applicant's response to

these rejections is based on the Office's referenced interpretation of Bosak. Thus, any change in the Office's interpretation of this reference shall constitute a new ground of rejection.

As indicated previously, Applicant traverses these rejections on the grounds that Bosak is not prior art. In addition Applicant traverses these rejections on the grounds that Applicant's claims recite features and relationships which are neither disclosed nor suggested in the prior art, and because there is no teaching, suggestion or motivation cited so as to produce Applicant's invention. The features recited in Applicant's claims patentably distinguish over the applied references.

Claim 12

Claim 12 is an independent claim directed to an automated transaction machine apparatus. Claim 12 recites that the automated transaction machine apparatus includes a first computer of a first type. The first computer includes at least one first output device that is operative to provide at least one output to users of the first machine. The first computer further includes at least one first input device that is operative to receive at least one input from users of the machine. Claim 12 further recites that the apparatus includes a first transaction function device, a first transaction machine interface software and a first instruction document in operative connection with the first computer. The first transaction function device is operative to carry out a transaction function. The first instruction document includes at least one command instruction. Claim 12 also recites that the first computer is operative responsive to at least one first input to the first input device, to cause the first transaction function device to carry out the transaction function. The first computer is further operative to generate a first output through the

first output device responsive to the first input, the first transaction machine interface software and at least one command instruction in the first instruction document.

The Action alleges that it would have been obvious to one of ordinary skill at the time of the invention to have provided standard printers and driver software with the types of computers described by Bosak so that users could make printouts of various screens. The Action further alleges that a standard printer is taken to meet Applicant's transaction function device. Applicant disagrees.

As discussed previously, Bosak does not disclose or suggest an ATM. Further Bosak does not disclose or suggest an ATM with a transaction function device that is operative to carry out a transaction function.

Claim 12 recites that the first computer of the ATM apparatus is operative to both operate the first transaction function device and generate a first output through the first output device responsive to a first input to the first input device. Bosak does not disclose or suggest operating both a transaction function device and generating a first output through an output device responsive to an input to an input device.

In addition claim 12 recites that the first output is also generated responsive to the first transaction machine interface software and at least one command instruction in the first instruction document. Bosak does not disclose or suggest operating a transaction function device responsive to a first input and generating an output responsive to the same first input and command instructions in a first instruction document.

The Action alleges that it is known that "on-screen indicators" are presented to a user indicating a print job has started. However, the Action has failed to show that such hypothetical

"on-screen indicators" are generated responsive to both an input to an input device and a first instruction document. In addition the Action does not cite a single prior art reference which both shows this functionality and includes a suggestion, teaching, or motivation to combine such a feature with Bosak. It is respectfully submitted that a claim may not be rejected based on the assertion that a feature specifically recited in the claim is "well known" absent a showing that all of the elements claimed are specifically disclosed in prior art references MPEP §2144.03.

It is respectfully submitted that Bosak does not disclose or suggest the features and relationships that are specifically recited in claim 12. As nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicant's invention, it is respectfully submitted that claim 12 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 13-22 and new claim 41 which depend from claim 12 are likewise allowable.

Claim 28

Claim 28 is an independent claim directed to an automated transaction machine. Claim 28 recites that the automated transaction machine comprises at least one computer and at least one visual output device in operative connection with the computer in the automated transaction machine. The visual output device is operative to provide outputs to users of the machine. Claim 28 further recites that the automated transaction machine comprises a plurality of documents and at least one style sheet in operative connection with the computer. The computer

is operative responsive to at least one of the documents to cause at least one visual output to be produced by the visual output device. Claim 28 also recites that at least one visual feature of the at least one visual output is produced responsive to the at least one style sheet.

As discussed previously, Bosak does not disclose or suggest an ATM. Further Bosak does not disclose or suggest an ATM which includes a style sheet. In addition Bosak does not disclose or suggest an ATM which is operative to cause a visual output to be produced by a visual output device of the ATM responsive to a document. Bosak also does not disclose an ATM with a visual feature of a visual output that is produced responsive to a style sheet.

As nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicant's invention, it is respectfully submitted that claim 28 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection has been overcome. It follows that claims 29-30 and new claim 42 which depend from claim 28 are likewise allowable.

The Dependent Claims

Each of the dependent claims depends directly or indirectly from an independent claim, and it is asserted that these dependent claims are allowable on the same basis. Furthermore, each of the dependent claims additionally recites specific features and relationships that patentably distinguish the claimed invention over the applied art. The applied references do not disclose or suggest the recited features and relationships of the dependent claims. There is no teaching, suggestion, or motivation to combine features of the applied references so as to produce the

claimed invention. Thus, it is respectfully submitted that these dependent claims are further allowable.

Claim 13

Amended claim 13 depends from claim 12 and recites that the apparatus further comprises a second automated transaction machine. The second automated transaction machine includes a second computer of a second type different from the first type. The second computer includes at least one second output device that is operative to provide at least one output to users of the second machine, and at least one second input device that is operative to receive at least one input from users of the machine. The second automated transaction machine further includes a second transaction function device, second transaction machine interface software, and a second instruction document in operative connection with the second computer. The second transaction function device is operative to carry out the transaction function. The second instruction document is substantially identical to the first instruction document. Claim 13 further recites that the second computer is operative responsive to at least one second input to the second input device to cause the second transaction function device to carry out the transaction function. The second computer is further operative to generate a second output through the second output device responsive to the second input, the second transaction machine interface software and at least one command instruction in the second instruction document.

As discussed previously, Bosak does not disclose or suggest an ATM. In addition Bosak does not disclose or suggest apparatus including both a first and a second ATM. Further Bosak does not disclose or suggest a second ATM which both operates a transaction function device

and generates an output through an output device responsive to a common input. In addition Bosak also does not disclose or suggest a second ATMs which both operates a transaction function device and generates an output through an output device responsive to an input, where the output is further generated responsive to command instructions in a first instruction document and transaction machine interface software. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 13 is further allowable on this basis.

Claim 14

Claim 14 depends from claim 13 and further recites that the first machine of the first type differs from the second machine of the second type in that the first output device comprises a different type of output device than the second output device. Bosak does not disclose or suggest an apparatus with two ATMs which include different types of output devices. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 14 is further allowable on this basis.

Claim 15

Claim 15 depends from claim 13 and further recites that the first computer of the first type differs from the second computer of the second type in that the first computer includes a different type of operating system than the second computer. Bosak does not disclose or suggest an apparatus with two automated transaction machines which include computers with different types of operating systems. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that the claim is further allowable on this basis.

Claim 16

Claim 16 depends from claim 13 and further recites that the first computer of the first type differs from the second computer of the second type in that the first computer is operative to cause the first transaction function device to carry out the transaction function responsive to a first input that is different than the second input that is operative to cause the second computer to cause the second transaction function device to carry out the transaction function.

Bosak does not disclose or suggest an apparatus with two ATMs which carry out the same transaction function with transaction function devices responsive to different inputs. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 16 is further allowable on this basis.

Claim 17

Claim 17 depends from claim 13 and further recites that the first computer of the first type differs from the second computer of the second type in that the first input device comprises a different type of input device than the second input device. Bosak does not disclose or suggest an apparatus with two automated transaction machines which carry out a transaction function with transaction function devices responsive to inputs from different types of input devices. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 17 is further allowable on this basis.

Claim 18

Claim 18 depends from claim 14 and further recites that the first output device includes a character based display device and the second output device includes a graphical display device. Bosak does not disclose or suggest an apparatus with two automated transaction machines, wherein one has a character based display device and the second output device includes a graphical display device. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 18 is further allowable on this basis.

Claim 19

Claim 19 depends from claim 17 and further recites that the first input device includes a key and the second input device includes a touch screen. As discussed previously, Bosak does not disclose or suggest an apparatus with two automated transaction machines which carry out a transaction function with transaction function devices responsive to inputs from different types of input devices. Bosak further does not disclose or suggest that the different types of input devices correspond to a key and a touch screen. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that the claim is further allowable on this basis.

Claim 20

Amended claim 20 depends from claim 12 and recites that the apparatus further comprises event processor software in operative connection with the first computer, wherein the event processor software is operative to cause the first transaction function device to carry out the

transaction function responsive to an event, wherein the first transaction machine interface software is operative to generate the event responsive to the first input.

Bosak does not disclose or suggest an automated transaction machine apparatus with an event processor software. In addition Bosak does not disclose or suggest event processor software that is operative to cause a transaction function device to carry out a transaction function responsive to an event. Further, Bosak does not disclose or suggest transaction machine interface software that is operative to generate the event responsive to an input. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that the claim is further allowable on this basis.

Claim 21

Amended claim 21 depends from claim 20 and further recites that the first transaction machine interface software includes at least one output indicative function, wherein when the first input is entered, the output indicative function is operative to indicate a value associated with at least one element included in an initial output through the first output device, wherein the event processor software is operative to call the output indicative function and is operative to cause the first transaction function device to operate responsive to the event and the value indicated by the output indicative function.

Bosak does not disclose or suggest transaction machine interface software that includes an output indicative function that is operative to indicate a value associated with an element included in an output presented by the automated transaction machine. Bosak further does not disclose or suggest an ATM which includes an event processor that is operative to call an output

indicative function of transaction machine interface software. Further Bosak does not disclose or suggest that such an event processor is operative to cause a transaction function device to operate responsive to an event and a value indicated by the output indicative function. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 21 is further allowable on this basis.

Claim 22

Claim 22 depends from claim 21 and further recites that the event processor software responsive to the event and the output indicative function, is operative to cause the first computer to generate an event response, wherein the first transaction machine software is operative to cause the computer to generate the first output responsive to the event response.

Bosak does not disclose or suggest an automated transaction machine that includes event processor software that is operative to cause a computer to generate an event response, responsive to an event and an output indicative function. In addition Bosak does not disclose or suggest an automated transaction machine that includes transaction machine software that is operative to cause a computer to generate an output responsive to the event response. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 22 is further allowable on this basis.

Claim 29

Claim 29 depends from claim 28 and recites that the automated transaction machine further comprises at least one input device in operative connection with the computer, wherein

the at least one visual feature of the at least one visual output is further produced responsive to the visual output device and the input device.

As discussed previously, Bosak also does not disclose or suggest an automated transaction machine with a visual feature of a visual output that is produced responsive to a styles sheet. In addition Bosak does not disclose or suggest that such a visual feature is produced responsive to a visual output device and an input device. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 29 is further allowable on this basis.

Claim 30

Claim 30 depends from claim 29 and recites that automated transaction machine further comprises at least one event processor. The at least one visual feature of the at least one visual output is further produced responsive to the event processor.

As discussed previously Bosak does not disclose or suggest an automated transaction machine with an event processor. Bosak does not disclose or suggest that the visual feature is further produced responsive to the event processor. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 30 is further allowable on this basis.

The Pending Claims Are Not Obvious Over Rivett-Carnac In View Of Bosak

In the Action claims 1-11, 23-27 and 33-40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rivett-Carnac in view of Bosak. These rejections are respectfully traversed. Applicant's response to these rejections is based on the Office's referenced

interpretation of Rivett-Carnac and Bosak. Thus, any change in the Office's interpretation of these references shall constitute a new ground of rejection.

As indicated previously, Applicant traverses these rejections on the grounds that Bosak is not prior art. In addition Applicant traverses these rejections on the grounds that Applicant's claims recite features and relationships which are neither disclosed nor suggested in the cited art, and because there is no teaching, suggestion or motivation cited so as to produce Applicant's invention. The features recited in Applicant's claims patentably distinguish over the applied references.

Claim 1

Claim 1 is an independent claim directed to an automated transaction machine. Claim 1 recites that the automated transaction machine comprises a computer operative to generate a user interface output and to receive a plurality of input signals. Claim 1 further recites that the machine includes at least one event processor software component, a transaction machine interface (TMI) and a document in operative connection with the computer. The document includes a plurality of command instructions. The TMI is operative responsive to the command instructions in the document to cause the computer to generate a user interface output. The TMI is further operative responsive to the user interface output and at least one input signal received by the computer, to cause an event to be generated. In addition the TMI is further operative responsive to at least one of the command instructions to cause the event to be directed to an event processor. Claim 1 further recites that the event processor is operative responsive to the

event to selectively cause the TMI to cause a change in the user interface output generated by the computer.

The Action alleges that Rivett-Carnac teaches a framework for transaction processing systems for a bank where the user interface is decoupled from the business logic. The Action further alleges that it would have been obvious to one of ordinary skill at the time of the invention to have provided such a banking transaction system with XML and style sheets as described by Bosak so that the data handling and transaction logic can be constructed without regard to output/interface, relying on style sheets to define the arrangement of the XML content.

Applicant disagrees. As discussed previously, Bosak is not prior art. Also, Bosak does not disclose or suggest an automated transaction machine. In addition Rivett-Carnac also does not disclose an automated transaction machine. Rather Bosak is directed to a discussion of the XML language and Rivett-Carnac is directed to a set of library components for programming a "dealing room system" (Page 126). Neither Rivett-Carnac nor Bosak discloses or suggests an automated transaction machine with the specific elements and features recited in claim 1.

In addition the Action shows no teaching, suggestion or motivation in the prior art to combine Rivett-Carnac and Bosak. Although Bosak discloses the XML language, Bosak does not include any teaching, suggestion, or motivation to create an ATM with both a transaction machine interface (TMI) software component and an event processor. Although Rivett-Carnac is directed to a programming architecture which separates the GUI interface (presentation layer) and business rules (page 126), Rivett-Carnac does not include any teaching, suggestion or motivation to create an automated transaction machine with a document that includes command

instructions for generating both a user interface output and for directing an event to an event processor.

Even if it were possible to combine Bosak with Rivett-Carnac, such a theoretical combination would still not include all the elements and features recited in claim 1. For example neither reference discloses a TMI that is operative to cause an event to be directed to an event processor responsive to a command instruction in a document. In addition neither reference discloses a TMI that is operative to both direct an event to an event processor and generate a user interface output responsive to command instructions in a document. Further, neither reference discloses an event processor that is operative responsive to an event, which is directed to it by a TMI responsive to a command instruction in a document.

It is respectfully submitted that Rivett-Carnac and Bosak do not disclose or suggest the features and relationships that are specifically recited in claim 1. As nothing in the cited art discloses or suggests the features and relationships that are specifically recited, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicant's invention, it is respectfully submitted that claim 1 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 2-11 which depend from claim 1 are likewise allowable.

Claim 23

Claim 23 is an independent claim directed to a method for operating an automated transaction machine. The method comprises: (a) reading an instruction document accessible to a computer with a TMI software component in operative connection with the computer, wherein

the instruction document includes a plurality of command instructions; (b) controlling a user interface output from the computer through operation of the TMI software component responsive to the command instructions; (c) receiving an input through an input device operatively connected with the computer; and (d) generating an event through operation of the TMI software component responsive to the input to the input device and the user interface being output from the computer. In addition claim 23 recites that the method comprises: (e) selectively directing the event through operation of the TMI software component to an event processor in operative connection with the computer, responsive to the command instructions; (f) generating an event response through operation of the event processor responsive to the event; and (g) modifying the user interface output from the computer through operation of the TMI software component responsive to the event response.

Bosak does not constitute prior art. Neither Rivett-Carnac nor Bosak discloses or suggests these features. As discussed previously neither reference is directed to the operation of an ATM. Further, neither reference discloses or suggests operating an ATM by selectively directing an event through operation of a TMI software component to an event processor responsive to command instructions in an instruction document.

Neither reference discloses or suggests operating the ATM by generating an event response with the event processor, responsive to the event generated and directed by the TMI software component. Further, neither reference discloses or suggests operating an ATM by modifying a user interface output with the TMI software responsive to the event response generated by the event processor.

It is respectfully submitted that Rivett-Carnac and Bosak do not disclose or suggest the features and relationships that are specifically recited in claim 23. As nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicant's invention, it is respectfully submitted that claim 23 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 24-26 which depend from claim 23 are likewise allowable.

Claim 33

Claim 33 is an independent claim directed to a method for operating an automated transaction machine. The method comprises: a) generating a user interface responsive to at least one document, at least one input device, and at least one output device; b) outputting the user interface through the output device; c) receiving an input from the input device; d) generating an event responsive to the input and the user interface; e) sending the event to a first event processor responsive to the document; f) modifying the user interface responsive to the event processor; and g) outputting the modified user interface through the output device.

Neither Rivett-Carnac nor Bosak discloses or suggests these features. As discussed previously neither reference is directed to the operation of an ATM. In addition neither reference discloses or suggests generating a user interface responsive to: 1) a document; 2) an input device; and 3) an output device. Further neither reference discloses sending an event to a first event processor responsive to the document. Also, Bosak is not prior art.

It is respectfully submitted that Rivett-Carnac and Bosak do not disclose or suggest the features and relationships that are specifically recited in claim 33. As nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicant's invention, it is respectfully submitted that claim 33 is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 34-40 which depend from claim 33 are likewise allowable.

The Dependent Claims

Claim 2

Claim 2 depends from claim 1 and further recites that the event processor is operative responsive to the event, to generate an event response. The TMI is operative responsive to the event response to cause the change in the user interface output generated by the computer. As discussed previously, neither Rivett-Carnac nor Bosak discloses or suggests an ATM which includes an event processor that is operative to generate an event response responsive to an event, where the event is directed to the event processor responsive to command instructions in a document. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 2 is further allowable on this basis.

Claim 3

Claim 3 depends from claim 1 and further recites that the TMI includes a plurality of subroutines which are operative to modify the user interface output. The event processor is operative to selectively call at least one of the subroutines responsive to the event. Neither Rivett-Carnac nor Bosak discloses or suggests an ATM with an event processor that is operative to selectively call subroutines of a TMI responsive to an event. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 3 is further allowable on this basis.

Claim 4

Claim 4 depends from claim 1 and recites that the machine further comprises a style sheet in operative connection with the computer, wherein the TMI is further operative to cause the computer to generate the user interface output responsive to the style sheet. As discussed previously, neither reference discloses or suggests that an ATM include a style sheet. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 4 is further allowable on this basis.

Claim 5

Claim 5 depends from claim 1 and further recites that the command instructions include an XML instruction. Neither Rivett-Carnac nor Bosak discloses or suggests an automated transaction machine with a TMI that is operative to direct an event to an event processor responsive to command instructions in a document that includes XML instructions. As nothing

in the applied art discloses or suggests this feature, it is respectfully submitted that claim 5 is further allowable on this basis.

Claim 6

Claim 6 depends from claim 1 and recites that the machine further comprises an output device in operative connection with the user interface output, and wherein the command instructions include an action menu command instruction, and wherein the TMI is further operative responsive to the action menu command instruction to cause the user interface output generated by the computer to produce a visual representation of an action menu on the output device.

The Action asserts that it would have been obvious to one of ordinary skill at the time of the invention to have included operable action menus as part of the interfaces, as these are well known GUI techniques that end users would be comfortable with. However, it is respectfully submitted that a claim may not be rejected based on the assertion that a feature specifically recited in the claim is "well known" absent a showing that all of the elements claimed are specifically disclosed in prior art references MPEP §2144.03. The Action has not shown that an action menu command instruction in a document is known in the prior art as required by MPEP §2144.03. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 6 is further allowable on this basis.

Claim 7

Claim 7 depends from claim 1 and further recites that the event processor includes a DLL.

Although Rivett-Carnac discloses that business logic rules may be implemented as library functions, neither Rivett-Carnac nor Bosak discloses or suggests an ATM with an event processor that includes the specific element of a DLL. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 7 is further allowable on this basis.

Claim 8

Claim 8 depends from claim 1 and recites that the machine further comprises at least one transaction function device in operative connection with the computer. The transaction function device is selectively operative to carry out a transaction function. The event processor is further operative responsive to the event, to cause the computer to operate the transaction function device.

It is respectfully submitted that neither Rivett-Carnac nor Bosak discloses or suggests an ATM with a transaction function device. Further neither reference discloses or suggests an ATM which includes an event processor that is operative responsive to an event, to both cause a TMI to change a user interface output and to cause a transaction function device to operate. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 8 is further allowable on this basis.

Claim 9

Claim 9 depends from claim 1 and further recites that the instruction document includes a plurality of instruction pages. Each instruction page includes a corresponding set including at least one command instruction. The TMI is further operative responsive to at least one command

instruction in the instruction document to select a first one of the instruction pages. The TMI is operative to cause the computer to generate a user interface output responsive to a first set included in the first instruction page. Claim 9 further recites that the TMI is further operative to cause the event to be directed to the event processor, responsive to the first set included in the instruction page.

Neither Rivett-Carnac nor Bosak discloses or suggests an ATM with a document that includes a plurality of instruction pages. In addition neither reference discloses a TMI that is responsive to a command instruction in the document to select one of the instruction pages in the document, and to generate a user interface output responsive to a set of command instructions included in the selected instruction page. In addition neither reference discloses a TMI that is responsive to direct an event to an event processor responsive to the set of command instructions included in the selected instruction page. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 9 is further allowable on this basis.

Claim 10

Claim 10 depends from claim 9 and further recites that the TMI is operative responsive to at least one input signal received by the computer, to select a second instruction page. The TMI is operative to cause the computer to generate a user interface output responsive to the second instruction page. The TMI is operative to direct a further event to an event processor responsive to at least one command instruction included in a second set in the second instruction page.

Neither Rivett-Carnac nor Bosak discloses or suggests an ATM with a TMI that is operative to select a second instruction page in a document responsive to a received input signal.

In addition neither reference discloses a TMI that is operative to generate a user interface output responsive to the selected second instruction page. In addition neither reference discloses a TMI that is operative to direct a further event to an event processor responsive to a command instruction in the selected second instruction page.

As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 10 is further allowable on this basis.

Claim 11

Claim 11 depends from claim 1 and further recites that the computer further comprises a display screen in operative connection with the user interface output, and wherein the user interface output is operative to cause a visible output to be produced on the display screen. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 11 is further allowable on this basis.

Claim 24

Amended claim 24 depends from claim 23 and further recites that the TMI software component comprises at least one subroutine operative to provide information indicative of at least one user interface output. Claim 24 further recites that the method comprises calling the subroutine through operation of the event processor responsive to the event.

Neither Rivett-Carnac nor Bosak discloses or suggests operating an automated transaction machine by calling a subroutine of a TMI through operation of an event processor responsive to an event. Further neither reference discloses that the subroutine of the TMI provides information

indicative of at least one user interface output. Nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 24 is further allowable on this basis.

Claim 25

Amended claim 25 depends from claim 23 and further recites that the TMI software component comprises at least one subroutine that is operative to enable at least one element included in the user interface output. Claim 25 further recites that the method comprises calling the subroutine responsive to operation of the event processor.

Neither Rivett-Carnac nor Bosak discloses or suggests operating an automated transaction machine by calling a subroutine of a TMI responsive to operation of an event processor. Further neither reference discloses that the subroutine of the TMI is operative to enable an element included in a user interface output. Nothing in the applied art discloses or suggests these features, and it is respectfully submitted that claim 25 is further allowable on this basis.

Claim 26

Amended claim 26 depends from claim 23 and further recites operating a transaction function device in operative connection with the computer responsive to the event processor. The transaction function device is operated responsive to the event being directed to the event processor.

Neither Rivett-Carnac nor Bosak discloses or suggests operating an automated transaction machine by operating a transaction function device responsive to an event processor being

directed an event. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 26 is further allowable on this basis.

Claim 34

Claim 34 depends from claim 33 and further recites (h) processing the event with the event processor responsive to the user interface. Neither Rivett-Carnac nor Bosak discloses or suggests processing an event with an event processor responsive to a user interface. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 34 is further allowable on this basis.

Claim 35

Claim 35 depends from claim 34 and further recites (i) performing a transaction with at least one transaction function device responsive to the event processor. Neither Rivett-Carnac nor Bosak discloses or suggests performing a transaction with a transaction function device responsive to an event processor. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 35 is further allowable on this basis.

Claim 36

Claim 36 depends from claim 35 and further recites that step (i) includes dispensing cash from a cash dispenser. Neither Rivett-Carnac nor Bosak discloses or suggests dispensing cash from a cash dispenser. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 36 is further allowable on this basis.

Claim 37

Claim 37 depends from claim 33 and further recites that in step (a) the user interface is further generated responsive to a style sheet. Neither Rivett-Carnac nor Bosak discloses or suggests generating a user interface responsive to: 1) a document; 2) an input device; 3) output device; and 4) a style sheet. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 37 is further allowable on this basis.

Claim 38

Claim 38 depends from claim 33 and further recites that in step (a) the document includes a plurality of pages and the user interface is further generated responsive to a first one of the plurality of pages, wherein in step (f) the user interface is further modified responsive to a second one of the plurality of pages. Neither Rivett-Carnac nor Bosak discloses or suggests a document that includes a plurality of pages. In addition neither reference discloses generating a user interface responsive to a first page of a document, and modifying the user interface responsive to a second page of a document. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 38 is further allowable on this basis.

Claim 39

Claim 39 depends from claim 38 and further recites that the first page specifies the first event processor and the second page specifies a second event processor. Neither Rivett-Carnac nor Bosak discloses or suggests a document that includes a plurality of pages. In addition neither reference discloses that a first page specifies a first event processor and a second page specifies a

second event processor. As nothing in the applied art discloses or suggests this feature, it is respectfully submitted that claim 39 is further allowable on this basis.

The New Claims

Claim 41 depends from claim 21 and further recites that the event processor software is operative to specify the at least one element when calling the output indicative function of the first transaction machine interface software.

Claim 42 depends from claim 30 and recites that the machine further comprises a cash dispenser in operative connection with the computer, wherein the cash dispenser is operative to perform a function responsive to the event processor.

Claim 43 depends from claim 31 and recites that the method further comprises: d) receiving at least one input through at least one input device on the machine, wherein the input is associated with the at least one component of the output; e) performing a transaction with at least one transaction function device on the machine responsive to the input and the document.

Claim 44 depends from claim 43 and further recites that the at least one transaction function device includes a cash dispenser, wherein step (e) includes dispensing cash from the cash dispenser.

Claim 45 is an independent claim directed to an ATM. Claim 45 recites that the ATM comprises: a computer; a first input device of a first type in operative connection with the computer; and a second input device of a second type in operative connection with the computer, wherein the first type and the second type are different types of input devices. Claim 45 further recites that the ATM includes at least one output device in operative connection with the

computer; at least one transaction function device in operative connection with the computer; and transaction machine interface software in operative connection with the computer. Claim 45 also recites that the transaction machine interface software is operative to cause the computer to access an instruction document which includes a set of command instructions that define features of a single user interface. The transaction machine interface software is further operative to cause the computer to output through the at least one output device, a first user interface responsive to the set of command instructions and the first input device being enabled. The transaction machine interface software is further operative to cause the computer to output through the at least one output device, a second user interface responsive to the set of command instructions and the second input device being enabled. Claim 45 further recites that the transaction machine interface software is operative to cause the computer to operate the transaction function device responsive to a first input through the first input device when the first user interface is being output, and the transaction machine interface software is operative to cause the computer to operate the transaction function device responsive to a second input through the second input device when the second user interface is being output.

Claim 46 depends from claim 45 and further recites that the transaction function device includes a cash dispenser.

Claim 47 is an independent claim directed to a method. Claim 47 recites: a) accessing an instruction document with at least one ATM, wherein the instruction document includes a set of command instructions that define features of a single user interface screen; b) presenting through a display device on the at least one ATM responsive to the set of command instructions, a first view of the user interface screen with elements adapted for selection using a first type of input

device; c) receiving at least one first input through a first input device of the at least one ATM that is of the first type of input device; d) operating the transaction function device of the at least one ATM responsive to receipt of the at least one first input while the first view is being presented. Claim 47 further recites: e) presenting through a display device on the at least one ATM responsive to the set of command instructions, a second view of the user interface screen including at least one second visual element different from the first visual element and adapted for selection using a second type of input device; f) outputting the second view of the user interface screen through the at least one display device of the ATM; g) receiving at least one second input through a second input device on the at least one ATM that is of the second type; and h) operating at least one transaction function device on the at least one ATM responsive to receipt of the at least one second input while the second view is being presented.

Claim 48 depends from claim 47 and recites that in steps (d) and (g), the at least one transaction function device operated includes a cash dispenser.

Claim 49 depends from claim 48 and recites that in step (c) the first input device includes a key, and where in step (f), the second input device includes a touch screen.

Claim 50 depends from claim 49 and recites that in step (a) the instruction document includes XML tags.

Claim 51 recites computer readable media bearing instructions which are operative to cause at least one computer in the ATM to cause the ATM to carry out the method steps recited in claim 47.

Claim 52 is an independent method claim. Claim 52 recites: a) accessing an instruction document with an ATM, wherein the instruction document includes at least two sets of XML

tags, which correspond to user interface elements for constructing at least two different user interface screens, wherein each set of XML tags is delineated by page tags which segregate and identify the sets of XML tags; and b) presenting a first user interface screen through at least one output device on the ATM responsive to a first set of XML tags in the instruction document, wherein the first set of XML tags is delineated by a first set of page tags.

Claim 52 further recites: c) receiving at least one first input from at least one input device on the ATM; d) presenting a second user interface screen through at least one output device on the ATM responsive to a second set of XML tags in the instruction document, wherein the second set of XML tags is delineated by a second set of page tags.

Claim 53 depends from claim 52 and recites that in step (b) the first set of XML tags specifies a first event processor, and further recites: e) calling the first event processor responsive to the at least one first input, the first user interface screen, and the first set of XML tags; and f) operating a first transaction function device on the ATM responsive to the event processor.

Claim 54 depends from claim 53 and recites that the first transaction function device includes a cash dispenser.

Claim 55 depends from claim 53 and recites that the second set of XML tags specifies a second event processor, and further recites: g) receiving at least one second input from the at least one input device of the ATM; h) calling the second event processor responsive to the second input, the second user interface screen and the second set of XML tags; and i) operating a second transaction function device on the ATM responsive to the second event processor.

Claim 56 depends from claim 52 and recites computer readable media bearing instructions which are operative to cause at least one computer in the machine to cause the machine to carry out the method steps recited in claim 52.

None of the cited references alone or in combination disclose or suggest the features and relationships that are specifically recited in these claims. As nothing in the cited art discloses nor suggests the features and relationships that are specifically recited in the claims, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicant's invention, it is respectfully submitted that new claims 41-56 are allowable for these reasons.

Fees For Additional Claims

Please charge the fees associated with the submission of sixteen claims in excess of twenty claims (\$288) and three independent claims in excess of three (\$240) and any other fee due to deposit account 09-0428 (InterBold).

Versions with Markings to Show Changes Made

13. (Once amended) The apparatus [Apparatus] including the first automated transaction machine according to claim 12, and further comprising:

a second automated transaction machine including:

a second computer of a second type different from the first type, and wherein the second computer includes at least one second output device, wherein the second output device is operative to provide at least one output to users of the second machine, and at least one second input device, wherein the second input device is operative to receive at least one input from users of the machine;

a second transaction function device in operative connection with the second computer, wherein the second transaction function device is operative to carry out the transaction function;

second transaction machine interface software in operative connection with the second computer;

a second instruction document substantially identical to the first instruction document, in operative connection with the second computer;

wherein the second computer is operative responsive to at least one second input to the second input device to cause the second transaction function device to carry out the transaction function, and wherein the second computer is further operative to generate a second output through the second output device responsive to the second input, the second transaction machine interface software and at least one command instruction in the second instruction document.

20. (Once amended) The apparatus according to claim 12 and further comprising:

event processor software in operative connection with the first computer₁; and] wherein the event processor software is operative to cause the first transaction function device to carry out the transaction function [is carried out] responsive to an event, wherein the first transaction machine interface software is operative to generate the event [generating an event] responsive to the first input [and the event processor software causing the first transaction function device to operate responsive to the event].

21. (Once amended) The apparatus according to claim 20 wherein the first transaction machine interface software includes at least one output indicative [instruction] function, wherein when the first input is entered, the output indicative function is operative to indicate a value associated with at least one element included in an initial output through the first output device

[when the first input is entered], wherein the event processor software is operative to call the output indicative function and is operative to cause the first transaction function device to operate responsive to the event and the value indicated by the output indicative function [instruction].

22. (Once amended) The apparatus according to claim 21 wherein the event processor software responsive to the event and the output indicative [instruction] function is operative to cause the first computer to generate an event response, wherein the first transaction machine software is operative to cause the computer to generate the first output responsive to the event response.

24. (Once amended) The method according to claim 24, wherein the TMI software component comprises at least one subroutine operative to provide information indicative of at least one user interface output, and further comprising [the step of] calling the subroutine through operation of the event processor responsive to the event.

25. (Once amended) The method according to claim 25 wherein the TMI software component comprises at least one subroutine that is operative to enable at least one element included in the user interface output, and further comprising [the step of] calling the subroutine responsive to operation of the event processor.

26. (Once amended) The method according to claim 23 and further comprising: [the step of] operating a transaction function device in operative connection with the computer responsive to the event processor, wherein the transaction function device is operated responsive to the event being directed to the event processor.

27. (Once amended) Computer readable media bearing instructions which are operative to cause [a] at least one computer in the machine to cause the machine to carry out the method steps recited in claim 23.

32. (Once amended) Computer readable media bearing instructions which are operative to cause [a] at least one computer in the machine to cause the machine to carry out the method steps recited in claim 31.

40. (Once amended) Computer readable media bearing instructions which are operative to cause [a] at least one computer in the machine to cause the machine to carry out the method steps recited in claim 33.

Conclusion

Each of Applicant's pending claims specifically recites features and relationships that are neither disclosed nor suggested in any of the applied art. Furthermore, the applied art is devoid of any such teaching, suggestion, or motivation for combining features of the applied art so as to produce Applicant's invention. Allowance of all of Applicant's pending claims is therefore respectfully requested.

The undersigned will be happy to discuss any aspect of the Application by telephone at the Examiner's convenience.

Respectfully submitted,



Ralph E. Jocke Reg. No. 31,029
Walker & Jocke
231 South Broadway
Medina, Ohio 44256
(330) 721-0000